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Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

**CENTRAL OREGON WILD HORSE
COALITION, GAYLE HUNT, and
MELINDA KESTLER,**

Plaintiffs,

v.

TOM VILSACK, Secretary of the U.S.
Department of Agriculture, **RANDY
MOORE**, Chief of the U.S. Forest Service,
GLENN CASAMASSA, Regional Forester,
Northwest Region of the U.S. Forest Service,
and **SHANE JEFFRIES**, Forest Supervisor
of Ochoco National Forest of the U.S. Forest
Service.

Defendants.

Case No. 2:21-cv-01443-HL

**FEDERAL DEFENDANTS'
UNOPPOSED MOTION FOR AN
EXTENSION OF TIME TO
RESPOND TO OBJECTIONS**

On May 18, 2023, the Court granted Plaintiffs' Motion for Extension of Time to File Objections to Magistrate's Findings and Recommendation. ECF No. 37. Pursuant to the Court's order, objections to the Findings and Recommendation are due by June 9, 2023. ECF No. 38; *see*

also ECF No. 35 (Findings and Recommendation). Under the Local Rules, responses are due 14 days after they are filed. L.R. 7-1(e)(1). Federal Defendants now respectfully request a one-week extension of time from the current deadline of June 23, 2023, until Friday, June 30, 2023, to file a response to Plaintiffs' objections to the Findings and Recommendation.

Pursuant to Local Rule 16-2(a), good cause exists for this request. Key personnel from the Forest Service who were intimately involved in the planning and execution of the challenged action have pre-existing travel planned between June 9 and June 23, and consequently, will be unavailable to provide input into Federal Defendants' response at that time. In addition, counsel for Federal Defendants have conflicting professional obligations in other cases that will make the current June 23 deadline challenging, including concurrent briefing in cases pending in the Northern District of California and the District Court for the District of Columbia. Moreover, this is the first extension Federal Defendants have sought for this deadline. The requested extension will not affect other deadlines as the case has been fully briefed and Findings and Recommendation have been entered. ECF Nos. 27-32, 35. Defense counsel has conferred with Plaintiffs' counsel and they have agreed not to oppose this motion.

Dated: May 23, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2023, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. Counsel of record currently identified on the Mailing Information list to receive e-mail notices for this case are served via Notices of Electronic Filing generated by CM/ECF.

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/s/ Christian Carrara

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